

# EXHIBIT D

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CHARLENE CARTER )  
)  
) CIVIL ACTION NO.  
VS. ) 3:17-CV-02278-X  
)  
SOUTHWEST AIRLINES CO., AND )  
TRANSPORT WORKERS UNION OF )  
AMERICA, LOCAL 556 )

-----  
CONFIDENTIAL  
TWU LOCAL 556 30(b)(6)  
ORAL DEPOSITION OF  
AUDREY STONE  
NOVEMBER 30, 2020  
-----

ANSWERS AND DEPOSITION OF AUDREY STONE,  
produced as a witness at the instance of the  
Plaintiff, taken in the above-styled and -numbered  
cause on NOVEMBER 30, 2020, at 9:00 a.m., before  
CHARIS M. HENDRICK, a Certified Shorthand Reporter  
in and for the State of Texas, witness located in  
Orting, Washington, pursuant to the Federal Rules  
of Civil Procedure, the current emergency order  
regarding the COVID-19 State of Disaster, and the  
provisions stated on the record or attached hereto.

1 any communications about Ms. Carter.

2 Q. Okay. Did anyone from the executive board  
3 ever have any communications with Thom McDaniel  
4 about Ms. Carter?

5 A. Not that I'm aware of. Not that I'm aware  
6 of. Yeah, not that I recall.

7 Q. Okay.

8 A. And I -- again, I don't recall any  
9 communications with the executive board. I believe  
10 there was one communication from the treasurer  
11 informing some of us that she had requested to stop  
12 her COPE deduction.

13 Q. Okay. Did anybody from the executive  
14 board ever have any communications with Don Shipman  
15 about Carter prior to her termination?

16 A. Not that I am aware of.

17 Q. Okay. Let's see. If I could direct you  
18 to Document 26. And I guess this will be marked as  
19 Exhibit 22.

20 THE REPORTER: Did you want to mark 17  
21 as 22 when you talked about it earlier?

22 MR. GILLIAM: No.

23 THE REPORTER: Okay.

24 (Exhibit 22 marked.)

25 A. Okay.

1 Q. (By Mr. Gilliam) And do you recognize  
2 this?

3 A. Yes.

4 Q. And what is it?

5 A. It's the email I just spoke about where  
6 Ms. Carter was requesting of our treasurer to stop  
7 her contributions to Committee on Political  
8 Education.

9 Q. Okay. And going, I guess, down to the  
10 first response from John Parrott on November 16th,  
11 2013; do you see where I am?

12 A. Yes.

13 Q. Okay. And it says, she has been  
14 supporting the thing she despises this entire time.

15 Did -- did the executive board know  
16 what political causes she -- she despised?

17 A. The executive board -- I don't know of any  
18 knowledge the executive board had regarding her  
19 political causes.

20 Q. Okay. And Cuyler Thompson responds, this  
21 just made my morning.

22 Did -- so Cuyler Thompson knew who she  
23 was prior to this email, correct?

24 A. Yes.

25 Q. Okay. And how did Cuyler Thompson know

1 A. No, I wasn't.

2 Q. Okay. So that's not a euphemism of some  
3 kind?

4 A. No. I had a queso dip I frequently made  
5 and took up to the union office that people really  
6 enjoyed eating.

7 Q. Okay. And Brett Nevarez says, yum to  
8 queso dip. So typical batshit/dipshit cannot read  
9 her paycheck.

10 And did you know who batshit/dipshit  
11 was?

12 A. I -- no. I -- I assumed that he was  
13 speaking to -- speaking about Ms. Carter because I  
14 believe she had already opted out of the union  
15 itself at this point and didn't realize she was  
16 still contributing to COPE.

17 Q. And had -- have you heard Brett Nevarez  
18 refer to her at any other time as batshit/dipshit?

19 A. Batshit/dipshit, no.

20 Q. Okay. Have you ever heard Brett at any  
21 other time refer to Ms. Carter as batshit?

22 A. Yes.

23 Q. Okay. And when was that?

24 A. I don't recall when it was.

25 Q. Okay. Was it on multiple other occasions?

1 I, AUDREY STONE, have read the foregoing  
2 deposition and hereby affix my signature that same  
3 is true and correct, except as noted above.

4  
5 \_\_\_\_\_  
6 AUDREY STONE

7 THE STATE OF \_\_\_\_\_  
8 COUNTY OF \_\_\_\_\_

9 Before me, \_\_\_\_\_, on this day  
10 personally appeared AUDREY STONE, known to me (or  
11 proved to me under oath or through \_\_\_\_\_) to  
12 be the person whose name is subscribed to the  
13 foregoing instrument and acknowledged to me that  
14 they executed the same for the purposes and  
15 consideration therein expressed.

16  
17 Given under my hand and seal of office this \_\_\_\_\_  
18 day of \_\_\_\_\_, 2020.

19  
20 \_\_\_\_\_  
21 NOTARY PUBLIC IN AND FOR THE  
22 STATE OF \_\_\_\_\_

23  
24 MY COMMISSION EXPIRES: \_\_\_\_\_  
25

1 REPORTER'S CERTIFICATION  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE NORTHERN DISTRICT OF TEXAS  
4 DALLAS DIVISION  
5 CHARLENE CARTER )  
6 )  
7 ) CIVIL ACTION NO.  
8 VS. ) 3:17-CV-02278-X  
9 )  
10 SOUTHWEST AIRLINES CO., AND )  
11 TRANSPORT WORKERS UNION OF )  
12 AMERICA, LOCAL 556 )  
13 )

14 -----  
15 CONFIDENTIAL  
16 TWU LOCAL 556 30(b)(6)  
17 DEPOSITION OF AUDREY STONE  
18 NOVEMBER 30, 2020  
19 (REPORTED REMOTELY)  
20 -----

21 I, CHARIS M. HENDRICK, Certified Shorthand  
22 Reporter in and for the State of Texas, do hereby  
23 certify to the following:

24 That the witness, AUDREY STONE, was by me  
25 duly sworn and that the transcript of the oral  
deposition is a true record of the testimony given  
by the witness.

I further certify that pursuant to Federal  
Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)  
as well as Rule 30(e)(2), that review of the  
transcript and signature of the deponent:

\_\_\_xx\_\_\_ was requested by the deponent and/or a

1 party before completion of the deposition.

2 \_\_\_\_\_ was not requested by the deponent and/or  
3 a party before the completion of the deposition.

4 I further certify that I am neither  
5 attorney nor counsel for, nor related to or  
6 employed by any of the parties to the action in  
7 which this deposition is taken and further that I  
8 am not a relative or employee of any attorney of  
9 record in this cause, nor am I financially or  
10 otherwise interested in the outcome of the action.

11 The amount of time used by each party at  
12 the deposition is as follows:

13 Mr. Gilliam - 2:43 hours/minutes  
14

15 Subscribed and sworn to on this 8th day of  
16 December, 2020.

17

18

19

20

21

22

23

24

25

*Charis M Hendrick*

CHARIS M. HENDRICK, CSR # 3469  
Certification Expires: 10-31-21  
Bradford Court Reporting, LLC  
7015 Mumford Street  
Dallas, Texas 75252  
Telephone 972-931-2799  
Facsimile 972-931-1199  
Firm Registration No. 38

